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Attorneys for Plaintiffs and the Proposed Classes

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

EVANGELINE RED and RACHEL
WHITT, on Behalf of Themselves and All
Others Similarly Situated,

Plaintiffs,

v.

KRAFT FOODS INC., KRAFT FOODS
NORTH AMERICA, AND KRAFT
FOODS GLOBAL, INC.,

Defendants.

Case No. 2:10-cv-01028 GW(AGR_x)

Pleading Type: Class Action

**DECLARATION OF GREGORY S.
WESTON IN SUPPORT OF
PLAINTIFFS' MOTION TO COMPEL
RESPONSES TO PLAINTIFFS'
REQUESTS FOR PRODUCTION AND
INTERROGATORIES AND PRODUCE
WITNESSES PURSUANT TO RULE
30(B)(6).**

Judge: The Hon. Alicia G. Rosenberg

Hearing: July 12, 2011 at 10:00am

Location: Courtroom D

1 I, Gregory S. Weston, declare:

2 1. I am counsel for Plaintiffs in this action. I make this Declaration in
3 support of Plaintiffs' Motion to Compel. I submit this Declaration to provide the
4 Court with seven Exhibits cited in Plaintiffs' portions of the Joint Stipulation
5 Regarding Plaintiffs' Motion to Compel.

6 2. Attached hereto as **Exhibit 1** is a true and correct copy of Plaintiffs'
7 First Requests for the Production of Documents from Kraft Foods Global, Inc.,
8 dated February 2, 2011.

9 3. Attached hereto as **Exhibit 2** is a true and correct copy of Plaintiffs'
10 First Set of Interrogatories Addressed to Kraft Foods Global, Inc., dated February
11 2, 2011.

12 4. Attached hereto as **Exhibit 3** is a true and correct copy of Defendant's
13 Responses to Plaintiffs' First Set of Requests for the Production of Documents
14 Addressed to Kraft Foods Global, Inc., dated March 1, 2011.

15 5. Attached hereto as **Exhibit 4** is a true and correct copy of Defendant's
16 Responses to Plaintiffs' First Set of Interrogatories Addressed to Kraft Foods
17 Global, Inc., dated March 1, 2011.

18 6. Attached hereto as **Exhibit 5** is a true and correct copy of Plaintiffs'
19 Notice of Taking Rule 30(b)(6) Deposition of Defendants, dated February 2, 2011.

20 7. Attached hereto as **Exhibit 6** is a true and correct copy of Defendant's
21 Objections to Plaintiffs' Notice of Taking Rule 30(b)(6) Deposition of Defendants,
22 dated March 1, 2011.

23 8. Attached hereto as **Exhibit 7** is a true and correct copy of a letter from
24 Gregory S. Weston, counsel for Plaintiffs, to Dean Panos, counsel for Kraft, dated
25 April 30, 2011.

26 9. Attached hereto as **Exhibit 8** is a true and correct copy of a letter from
27 Jack Fitzgerald, counsel for Plaintiffs, to Dean Panos, dated May 11, 2011.
28

1 DATED: June 15, 2011

Respectfully Submitted,

2
3 /s/Gregory S. Weston

4 Gregory S. Weston

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